

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
(Eastern Division)

| | | |
|------------------------------------|---|-------------------------|
| CHARLES C. JOHNSON, <i>et. al</i> | : | |
| | : | Case No. 14:15-cv-01137 |
| Plaintiffs, | : | |
| v. | : | |
| GAWKER MEDIA, LLC, <i>et. al</i> , | : | |
| | : | |
| Defendants. | : | |
| | : | |

DECLARATION OF NATHAN E. SIEGEL

I, Nathan Siegel, declare:

1. I am a partner in the law firm of Levine Sullivan Koch & Schulz, LLP, and counsel, *pro hac vice*, for Defendants in the above-captioned matter. I am competent to testify as to the facts set forth below, and, if called as a witness, could and would testify to such facts based on personal knowledge and under oath. I submit this declaration for purposes of submitting additional exhibits in support of the Defendants' Special Motion to Strike Pursuant to the California anti-SLAPP Statute.

2. Attached hereto as Exhibit A is a true and correct copy of an article by Taylor Wofford, entitled "Did Cuban Agents Plant a Daily Caller Story Smearing Democratic Sen. Menendez?", which was published by Newsweek on July 8, 2014, and is available online at <http://www.newsweek.com/cuban-intelligence-agents-daily-caller-smearing-senator-menendez-257896>.

3. Attached hereto as Exhibit B is a true and correct copy of an article by Charles C. Johnson, entitled "Why Can't We Publish Addresses of New York Times Reporters?", which

was published by Got News on Nov. 25, 2014, and is available online at <http://gotnews.com/cant-publish-addresses-new-york-times-reporters>.

4. Attached hereto as Exhibit C is a true and correct copy of an article by Terrence McCoy, entitled “Meet the divisive blogger who says he outed Rolling Stone’s Jackie,” which was published by the *Washington Post* on December 9, 2014, and is available online at <http://www.washingtonpost.com/news/morning-mix/wp/2014/12/09/the-blogger-who-wants-to-take-down-rolling-stone-jackie-and-the-university-of-virginia-president>.

5. Attached hereto as Exhibit D is a true and correct copy of an article by Brett Logiurato entitled “Meet the ‘Mega Troll’ Who’s Turned A Major US Senate Race Into His Own Performance Art Piece,” which was published by *Business Insider* on July 11, 2014, and is available online at <http://www.businessinsider.com/charles-johnson-mississippi-senate-race-mcdaniel-cochran-2014-7>.

6. Attached hereto as Exhibit E is a true and correct copy of an article by Sam Hall entitled “Charles Johnson reaches new low with James Foley Tweets,” which was published by *The Clarion Ledger* on August 19, 2014, and is available online at <http://www.clarionledger.com/story/dailyledes/2014/08/19/charles-johnson-james-foley-tweets/14320165>.

7. Attached hereto as Exhibit F is a true and correct copy of an article by Rosie Gray and Ruby Cramer entitled “Reporter Who Questioned Cory Booker’s Residency Also Worked For Anti-Booker PAC,” which was published by *Buzzfeed* on Dec. 17, 2013, and is available online at <http://www.buzzfeed.com/rosiegray/conservative-writer-who-questioned-cory-bookers-residency#.jjRrRWgm0R>.

8. Attached hereto as Exhibit G is a true and correct copy of an article by Tom Kludt entitled “Charles C. Johnson’s Twitter Account Suspended,” which was published by *Talking*

Points Memo on October 7, 2014, and is available online at <http://talkingpointsmemo.com/livewire/chuck-c-johnson-twitter-suspended>.

9. Attached hereto as Exhibit H is a true and correct copy of an article by Alejandro Alba entitled “GotNews reporter is blasted on social media for revealing name of alleged UVA rape victim,” which was published by the *New York Daily News* on December 8, 2014, and is available online at <http://www.nydailynews.com/news/national/reporter-criticized-revealing-uva-rape-victim-article-1.2037087>.

10. Attached hereto as Exhibit I is a true and correct copy of an article by Christopher Zera entitled “Twitter Harassment? Charles C. Johnson Boasts of Doxing ‘Jackie,’ Alleged UVA Rape Victim,” which was published by *International Business Times* on December 8, 2014, and is available online at <http://www.ibtimes.com/twitter-harassment-charles-c-johnson-boasts-doxing-jackie-alleged-uva-rape-victim-1743596>.

11. Attached hereto as Exhibit J is a true and correct copy of an article by Gary Legum entitled “Twitter’s Biggest Scumbag Chuck C. Johnson Outs Rape Victim to Teach Feminists a Lesson,” which was published by *Wonkette* on Dec. 8, 2014, and is available online at <http://wonkette.com/568535/twitters-biggest-scumbag-chuck-c-johnson-outs-rape-victim-to-teach-feminazis-a-lesson>.

12. Attached hereto as Exhibit K is a true and correct copy of an article by Susan Milligan entitled “A Bully and a Troll,” which was published by *U.S. News & World Report* on December 9, 2014, and is available online at <http://www.usnews.com/opinion/blogs/susan-milligan/2014/12/09/charles-c-johnsons-cruel-trolling-of-uva-rape-survivor-jackie>.

13. Attached hereto as Exhibit L is a true and correct copy of an article by Jacob Silverman entitled “Is Charles Johnson a Digital Darth Vader?”, which was published by

POLITICO on December 11, 2014, and is available online at

http://www.politico.com/magazine/story/2014/12/charles-johnson-a-digital-darth-vader-113522_Page2.html#.VdHoi7LD8p4.

14. Attached hereto as Exhibit M is a true and correct copy of an article by Betsy Rothstein entitled “Charles Johnson Plans Libel Lawsuit Jihad On Media,” which was published by the *Daily Caller* on December 11, 2014, and is available online at

<http://dailycaller.com/2014/12/11/charles-johnson-plans-libel-lawsuit-jihad-on-media/>.

15. Attached hereto as Exhibit N is a true and correct copy of an article by Adam Steinbaugh entitled “The Unrealized Defamation Threats of Charles C. Johnson,” which was published on Adam Steinbaugh’s Blog about Law and Tech. on Dec. 10, 2014, and is available online at <http://adamsteinbaugh.com/2014/12/10/the-unrealized-defamation-threats-of-charles-c-johnson>.

This Declaration was executed on the 24th day of August, 2015, in Washington, D.C. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.



NATHAN E. SIEGEL

CERTIFICATE OF SERVICE

The undersigned certifies that on this 24th day of August, 2015, a true copy hereof was served with the Clerk of the Court using the CM/ECF system on the following:

Jonathon Christian Burns
THE BURNS LAW FIRM, LLC
1717 Park Avenue
St. Louis, MO 63104
john@burns-firm.com

Attorneys for Plaintiffs

By: /s/ Joseph E. Martineau